

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N D I C T M E N T

Plaintiff,

) 5 : 19 CR 742

v.

) CASE NO.

BRAD LEWIS BRADLEY,

) Title 18, United States Code,
United States Code, Sections
Section 924(c)(1)(A)(i); Title 21,
841(a)(1) and (b)(1)(B)(vi)

Defendant.

COUNT 1
(Possession with Intent to Distribute Fentanyl,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(vi))

JUDGE ADAMS

The Grand Jury charges:

1. On or about September 12, 2019, in the Northern District of Ohio, Eastern Division, Defendant BRAD LEWIS BRADLEY did knowingly and intentionally possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi).

COUNT 2
(Possession of Firearms in Furtherance of Drug Trafficking Offenses,
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

2. On or about September 12, 2019, in the Northern District of Ohio, Eastern Division, Defendant BRAD LEWIS BRADLEY did knowingly possess firearms, specifically, a Smith and Wesson, .40 caliber pistol, bearing serial number DVN8228, and a Smith and Wesson 9 millimeter pistol, bearing serial number VDL5880, in furtherance of a drug trafficking crime

for which he may be prosecuted in a court of the United States, specifically, Possession with the Intent to Distribute at least 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi), as charged in Count 1 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 and 2, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendant BRAD LEWIS BRADLEY shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and, any and all property (including firearms and ammunition) involved in or used in the commission of such violations, including, but not limited to, the following: a Smith and Wesson, .40 caliber pistol, bearing serial number DVN8228, and a Smith and Wesson 9 millimeter pistol, bearing serial number VDL5880, and ammunition.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.